

**Exhibit A**  
PROPOSED ORDER

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

FIRESTAR DIAMOND, INC., *et al.*

Debtors.

RICHARD LEVIN, trustee for the liquidating  
trust of FIRESTAR DIAMOND, INC. and OLD  
AJ, INC.,

Plaintiff,

v.

AMI JAVERI (A/K/A AMI MODI); PURVI  
MEHTA (A/K/A PURVI MODI); NEHAL  
MODI; NEESHAL MODI; CENTRAL PARK  
REAL ESTATE, LLC; CENTRAL PARK  
SOUTH 50 PROPERTIES, LLC; TRIDENT  
TRUST COMPANY (SOUTH DAKOTA) INC.,  
solely as Trustee of the ITHACA TRUST;  
TWIN FIELDS INVESTMENTS LTD.;  
AURAGEM COMPANY LTD.; BRILLIANT  
DIAMONDS LTD.; ETERNAL DIAMONDS  
CORPORATION LTD.; FANCY CREATIONS  
COMPANY LTD.; SINO TRADERS LTD.;  
SUNSHINE GEMS LTD.,

Defendants

Chapter 11

No. 18-10509 (SHL)

(Jointly Administered)

Adv. Proc. No. 20-1054 (SHL)

**ORDER (I) CONFIRMING THE TRUSTEE'S  
AUTHORITY TO TAKE DISCOVERY OF DEFENDANT  
AMI JAVERI UNDER CPLR § 6220; (II) DIRECTING DEFENDANT  
AMI JAVERI TO RESPOND TO THE TRUSTEE'S MARCH 7,  
2022 DOCUMENT REQUESTS; AND (III) GRANTING RELATED RELIEF**

This matter coming before the Court on the motion (“**Motion**”) of Richard Levin, as trustee (the “**Trustee**”) for the liquidating trust of Firestar Diamond, Inc. and Old AJ, Inc. for entry of an order (I) confirming that the Trustee is authorized to take discovery of defendant Ami Javeri under New York Civil Practice Law and Rules (“**CPLR**”) § 6220; (II) directing Javeri to produce documents responsive to the *Trustee's First Request for Production of Documents*, dated March 7, 2022 (the “**RFPs**”); and (III) granting related relief; the Court having reviewed the Motion and the declaration of Angela M. Allen (the “**Allen**

**Declaration**”) filed in support thereof; the Court having found that the Court has jurisdiction over this matter under 28 U.S.C. § 1334; and the Court having determined that the legal and factual bases set forth in the Motion and the Allen Declaration satisfy the requirements of CPLR § 6220, Federal Rule of Civil Procedure 37, Federal Rules of Bankruptcy Procedure 7037, Local Bankruptcy Rule 7007-1, and establish just cause for the relief requested therein;

**IT IS HEREBY ORDERED:**

1. The Motion is granted as set forth herein.
2. In accordance with CPLR § 6220, the Trustee may take discovery, including but not limited to requests for production, interrogatories, and depositions, of the Javeri and any other person or entity that may have information concerning the Javeri’s attachable property or debt.
3. Javeri shall complete production of documents responsive to the RFPs within 14 days of entry of this Order.
4. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.

Dated: \_\_\_\_\_, 2023  
White Plains, New York

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HONORABLE SEAN H. LANE  
UNITED STATES BANKRUPTCY JUDGE